



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION I
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May 9, 2005

Lonnie Monaco (monacolj@efane.northdiv.navy.mil)
Engineering Field Activity Northeast, Naval Facilities Engineering Command
Code 1821/LM
10 Industrial Highway, Mailstop 82
Lester, PA 19113-2090

**Re: Response to EPA Comments on the Monitoring Event #24 Report for Sites
1,3 & the Eastern Plume Long Term Monitoring, April 2004, dated February
2005, Naval Air Station Brunswick, Maine**

Dear Mr. Monaco:

Pursuant to § 6 of the Naval Air Station Brunswick, Maine Federal Facility Agreement dated October 19, 1990, as amended (FFA), the Environmental Protection Agency has reviewed the subject document and comments are below. In general, the Responses agree to make recommended changes to the document. A number of the items discussed will require re-examination of the data, and the exact changes that will result were not yet known at the time the Responses were prepared. For this reason, final assessment of the Responses will await release of the revised document. The following follow-up remarks highlight Comments for which further assessment is pending. The numbering adopted in the Navy Responses is retained here.

General Comments

2. The Comment noted that the addition of 1,4-dioxane analysis to selected wells in ME24 changes the basis of comparison of figures for total VOCs among wells and among monitoring rounds. The Response suggests that 1,4-dioxane will be omitted from the calculation of total VOCs, and discussed separately. This is a good way to maintain consistency, as well as completeness; the proposed accounting should be adopted.

3, 27. The Comment noted that the MNA "scoring" was in error with respect to methane data. The Response agrees to check and revise the table. This is welcome, as the impact to the overall assessment of conditions favorable or unfavorable to reductive dechlorination will be significant.

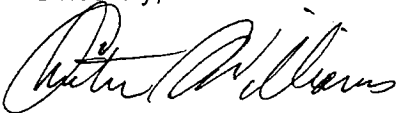
Specific Comments

9. The Comment recommended that monthly flow-rate data be reported. The Response states that the requested data will be tabulated and included. This will be useful, reference data with regard to system performance, as well as potential impacts on the LTM monitoring wells.

19, 21. The Comment noted that chloride data are of questionable value as an indicator of reductive dechlorination in the local setting at NASB. The Response notes correctly that chloride is only one index of MNA potential. It is agreed that chloride can be left in the assessment in order to conform to the protocol outlined in the EPA guidance. Appropriate circumspection is urged. The proposed effort to re-examine the "reference" values for the MNA assessment (e.g., to average over a number of agreed-upon "background" wells, rather than relying upon results from MW-1104) may have a significant effect on the weight given to chloride.

If you have any questions with regard to this letter, please contact me at (617) 918-1384.

Sincerely,



Christine A.P. Williams, RPM
Federal Facilities Superfund Section

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